APPENDIX G

Letters and Permits Received Through Interagency Consultation Concerning Threatened, Endangered, and Sensitive Species and Habitats

WASHINGTON STATE DEPARTMENT OF
Natural Resources

DOUG SUTHERLAND
Commissioner of Public Lands

January 15, 2004

Chad Phillips
Plant Protection Division – Entomology Branch
Department of Agriculture
3939 Cleveland Ave SE
Olympia WA 98501

SUBJECT: Three Gypsy Moth Eradication Projects: Bellevue (T25N R05E S28,33); Port Ludlow (T28N R01E S17); and Mayfield (T13N R02E S35)

We've searched the Natural Heritage Information System for information on significant natural features in your project areas. Currently, we have no records for rare plants or high quality native ecosystems in the vicinity of your projects.

The information provided by the Washington Natural Heritage Program is based solely on existing information in the database. In the absence of field inventories, we cannot state whether or not a given site contains high quality ecosystems or rare plant species; there may be significant natural features in your study areas of which we are not aware.

The Washington Natural Heritage Program is responsible for information on the state's rare plants as well as high quality ecosystems. For information on animal species of concern, please contact Priority Habitats and Species, Washington Department of Fish and Wildlife, 600 Capitol Way N, Olympia WA 98501-1091, or by phone (360) 902-2543.

Please visit our internet website at http://www.dnr.wa.gov/nhp for more information. Lists of rare plants and their status, as well as rare plant fact sheets, are available for download from the site. Please feel free to call me at (360) 902-1667 if you have any questions, or by e-mail at sandra.moody@wadnr.gov.

Sincerely,

Sandy Swope Moody

Sandy Swope Moody, Environmental Review Coordinator
Washington Natural Heritage Program

Asset Management & Protection Division, PO Box 47014, Olympia WA 98504-7014
FAX 360-902-1789

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State of Washington
DEPARTMENT OF FISH AND WILDLIFE

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Main Office Location: Natural Resources Building • 1111 Washington Street SE • Olympia, WA

February 12, 2004

Mr. Chad Phillips
Washington State Department of Agriculture
Post Office Box 42560
Olympia, WA 98504-2560

Dear Mr. Phillips:

This letter is in response to your December 12, 2003 request to review our butterfly records for the Washington State Department of Agriculture (WSDA) proposed 2004 gypsy moth (*Lymantria dispar*) eradication. We have reviewed our butterfly data and evaluated site habitat conditions for the proposed Bellevue, Port Ludlow, and Mayfield treatment areas. According to your request letter, the proposed Bellevue treatment area is approximately 11 acres and located in T25N R5E S28 and S33; Port Ludlow is approximately 18 acres and in T28N R1E S17; Mayfield is located in T13N R2E S35, and according to our December 30, 2003 telephone discussion, is now approximately 7.5 acres in size. We understand that evidence of gypsy moth reproduction (egg cases) has been found at both the Bellevue and Port Ludlow sites, and pupal cases have been located at the Mayfield site. According to your letter, WSDA proposes as many as four ground-based applications of *Bacillus thuringiensis* var. *kurstaki* (Btk) at each of the sites.

We have reviewed our butterfly records and evaluated local landscape and site habitat conditions at each of the treatment areas for their potential to support rare, state candidate or state listed butterflies. We found no butterfly species of concern records in the immediate proposed Btk application areas or within a 5-mile radius of the areas. Habitat conditions were assessed using aerial photos and WSDA site descriptions. The vegetation conditions at and near these sites make it highly unlikely that they could support rare lepidopterans. The Bellevue proposed treatment site is highly urbanized, the Port Ludlow site is in a high-density housing development, and the Mayfield site is located in a dairy farm's residence yard and barnyard.

We are generally cautious about the use of Btk, due to the potential for impacting local non-target lepidopterans, particularly low-dispersing species that are isolated or patchily distributed. However, given the habitat conditions present at the proposed treatment sites, it is unlikely that such species inhabit these areas. Direct effects on non-target lepidopterans and any associated indirect effects on non-target vertebrates are likely to be minimal and short-term as the application areas are small and habitat within the areas is similar to the surrounding landscape, factors that support lepidopteran recolonization. We recognize the importance and support early

eradication of gypsy moth when populations become established in Washington. We encourage WSDA's participation in ongoing research to develop effective gypsy moth treatment methods that are less harmful to non-target Lepidoptera.

I hope this information is helpful. If you have any further questions, please contact me at 360-902-2496.

Sincerely,

Ann E. Potter

Ann E. Potter, Wildlife Biologist
Wildlife Diversity Division

AEP:aep:ahr

cc: Fred Dobler
Carl Dugger
Jack Smith
Steve Kalinowski
Lora Leschner
Rich Costello
Robert M. Pyle
Richard Youel

WASHINGTON STATE DEPARTMENT OF
Natural Resources

DOUG SUTHERLAND
Commissioner of Public Lands

March 15, 2004

Mr. Lee Faulconer
Washington State Department of Agriculture
PO Box 42560
Olympia, WA 98504-2560

Dear Mr. Faulconer:

Thank you for the opportunity to review the Draft Environmental Assessment Cooperative Gypsy Moth Eradication Project King, Jefferson and Lewis Counties Washington March 1, 2004. I wish to comment on the three Determinations of Non-significance related to the 2004 Gypsy Moth Eradication Projects.

I agree that the status "no established population" in Washington is true. I also agree that "eradication" is the appropriate approach for dealing with the three detections of European Gypsy Moth multiple life stages in King, Jefferson, and Lewis Counties.

If the operation goes forward as described, three treatments of B.t.k. on these small sites are likely to effectively eradicate gypsy moth and are unlikely to cause harm to natural resources or the environment. In contrast, failure to prevent gypsy moth from becoming established in Washington could allow gypsy moths to become established and have grave consequences for native plants (as they are severely defoliated), native wildlife (as forests and woodlands are changed by gypsy moth), human health (as people contact irritating hairs), the economy (as Washington is restricted by national and state quarantines), and environmental quality (as pesticide use increases in affected areas).

I appreciate your conscientious efforts to protect natural resources in Washington.

Sincerely,

Karen Ripley

Karen Ripley
Forest Entomologist, Forest Health Program Manager

Copy: file
Dave Dietzman, DNR Asset Management Protection Division